## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MARYLAND (Baltimore Division)

Case No.: 24-12659-DER Chapter 13
Chapter 13

## MOTION FOR EXTENSION OF TIME TO FILE AMENDED CHAPTER 13 PLAN

Bradley S. Korisher, Debtor, by and through undersigned counsel, Eric S. Steiner, and pursuant to Fed. R. Bankr. Proc. 9006(b)(1) requests that this Honorable Court grant an extension of time to file an amended Chapter 13 Plan, and in support thereof, states:

- 1. On March 29, 2024 (the "Petition Date"), the Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code, commencing in this Court in Case No. 24-12659.
  - 2. Brian A. Tucci was appointed Chapter 13 trustee in this matter.
- 3. On the Petition Date, the Debtor was receiving disability due to a workplace injury, and some or all of the disability benefits have reached their limits.
  - 4. The Debtor intends on returning to work on approximately August 1, 2024.
- 5. The Debtor requires additional time to file an amended Chapter 13 plan to reevaluate his income after August 1, 2024.
  - 6. No creditor or other party will be prejudiced by the Debtor's request.

WHEREFORE, Bradley S. Korisher, Debtor, requests that this Honorable Court grant an extension of time to allow the Debtor to file an amended Chapter 13 plan.

Respectfully submitted

/s/ Eric S. Steiner
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Federal Bar No. 28705

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15th day of July 2024, a copy of the foregoing was served by the Court's CM/ECF system to:

Brian A. Tucci Chapter 13 Trustee

> /s/ Eric S. Steiner Eric S. Steiner